

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

In Re:)	
Mary Crooks,)	Case No. 05-71032
)	
)	Chapter 13
)	
Debtor/Movant.))	Debtors' Motion to Release Garnishment

MOTION FOR ORDER OF RELEASE OF WRIT OF GARNISHMENT

Come now Debtors, Mary Crooks, by and through her attorney of record, and for her Motion to Release Garnishment states as follows:

1. That Debtor filed for Chapter 13 bankruptcy relief on October 15, 2005.
2. As of that date, Debtor's wages were subject to a writ of garnishment executed by the IRS, garnishing creditor.
3. That the garnishment was for a judgment.
4. That any wages earned by a debtor post-petition are protected by automatic stay, pursuant to 11 U.S.C. § 362(a).

WHEREFORE, Debtor's respectfully pray for an Order of Release of Writ of Garnishment as to any and all post – petition wages subject to the writ of garnishment and for such other and further relief as the Court deems just and proper under the circumstances.

CASTLE LAW OFFICES OF KANSAS CITY, P.C.

By: /s/Jason C. Amerine
Jason C. Amerine #50857
Attorney for Debtor
818 Grand Blvd., Ste. 700
Kansas City, MO 64106
(816) 842-6200

CERTIFICATE OF SERVICE

The undersigned hereby states that a true copy of the Motion to Release Garnishment was mailed via first class mail, postage pre-paid, or via electronic filing to the parties listed below, on this October 25, 2005.

/s/Jason C. Amerine
Jason C. Amerine #50857

TRUSTEE:

Mr. Richard Fink
Chapter 13 Trustee
818 Grand, Ste. 800
Kansas City, MO 64106

US Trustee
400 E. Ninth St., Rm 3440
Kansas City, MO 64106

CREDITOR:

IRS
P.O .Box 970011
Saint Louis, MO 63197

Internal Revenue
Stop 6692 AUSC
Austin, TX 73301-0021

CREDITOR'S ATTORNEY

US Attorneys Office
400 E. Ninth St., Fifth Floor
Kansas City, MO 64106

DEBTOR'S EMPLOYER:

Select Specialty Prospect
10550 Quivira Rd.
Suite 450
Lenexa, KS 66215

DEBTORS

Mary Crooks
11328 Blue Ridge Blvd. Apt 1
Kansas City, MO 64134